

FILED

AUG - 6 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

SHERMAN DIVISION

NELSON WILLIS,
Plaintiff,

v.

ADAM M. ARON,
Defendant.

Case No.: 4:23-cv-00732-ALM

PLAINTIFF'S RESPONSE TO DEFENDANT'S DOCUMENT 83 AND MOTION FOR SANCTIONS

I. Introduction

Plaintiff finds no joy in involving our most esteemed United States Magistrate and United States District Judges in this matter. However, it is evident that the defense counsel has entangled these honorable judges in their fraudulent scheme, and now they must face the consequences of their actions.

Plaintiff Nelson Willis, Pro Se, submits this response to Document 83, the defendant's response to the Plaintiff's motion to remove the United States District Judge. Plaintiff emphasizes that every filing by the defendant's attorneys in this case constitutes additional counts of fraud against the United States District Court.

II. Warning to Defendant and Counsel

This is a stern warning to the defendant Adam M. Aron and his counsel. Your persistent and deceitful actions have not only undermined the integrity of these proceedings but have also dragged these honorable judges into your fraudulent scheme. Your behavior is contemptible and demonstrates a flagrant disregard for the judicial system.

Every filing you have made in this case is unequivocally fraudulent. You have continuously misrepresented the status of the lower court case, committing acts of felony fraud with each submission. Your continued filing of fraudulent documents only compounds your offenses and adds further counts of felony fraud against a United States District Court.

This Court will not tolerate your misconduct. You have been explicitly warned. Any further fraudulent filings will be met with severe sanctions, including but not limited to the imposition of punitive damages, criminal charges, and the possibility of disbarment for those responsible.

III. Motion for Sanctions and Summary Judgment

In light of the defendant's and their counsel's egregious behavior, Plaintiff respectfully moves this Court to impose the following sanctions and grant summary judgment in favor of the Plaintiff:

- 1. Immediate Cease of Fraudulent Filings:** Order the defendant and their counsel to immediately cease filing any further fraudulent documents in this case.
- 2. Monetary Sanctions:** Impose significant monetary sanctions against the defendant and their counsel for each instance of fraudulent filing, to be determined by the Court.
- 3. Criminal Referral:** Refer the matter to the appropriate authorities for criminal prosecution for the felonies committed by the defendant and their counsel, including fraud, obstruction of justice, and conspiracy to defraud the United States.
- 4. Disbarment Proceedings:** Initiate proceedings to disbar the attorneys responsible for the fraudulent filings, to prevent further abuse of the legal system.
- 5. Award Costs and Fees:** Order the defendant and their counsel to pay all costs and attorney's fees incurred by the Plaintiff as a result of their fraudulent actions.
- 6. Grant Summary Judgment:** Grant summary judgment in favor of the Plaintiff, recognizing the procedural misconduct and fraudulent activities of the defendant and his attorneys.

IV. Conclusion

The defendant and their counsel have flagrantly abused the judicial process, committing multiple acts of felony fraud and dragging the honorable judges of this Court into their scheme. Plaintiff respectfully requests that this Court impose the requested sanctions and grant summary judgment to uphold the integrity of the judicial system and to ensure that justice is served.

Respectfully submitted,


Nelson Willis
Plaintiff Pro Se
1405 County Road 208
Gainesville, TX 76240
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record via the court's electronic notification system on this 6th day of August, 2024.


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Respondent Pro Se
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[PROPOSED] ORDER GRANTING SUMMARY JUDGMENT AND SANCTIONS

Before the Court is Plaintiff Nelson Willis's Motion for Summary Judgment and Motion for Sanctions. Upon consideration of the motion, the supporting evidence, and the entire record, the Court finds that there is no genuine dispute as to any material fact and that the Plaintiff is entitled to judgment as a matter of law. The Court also finds that the defendant and their counsel have engaged in fraudulent behavior warranting sanctions.

IT IS HEREBY ORDERED THAT:

1. Summary Judgment is GRANTED in favor of the Plaintiff, Nelson Willis.
2. The Defendant, Adam M. Aron, is ordered to pay the Plaintiff compensatory damages and punitive damages as specified in the Plaintiff's Motion for Summary Judgment (Document 80).
3. The Defendant and their counsel are ordered to cease filing any further fraudulent documents in this case.
4. Monetary sanctions are imposed against the defendant and their counsel for each instance of fraudulent filing, to be determined by the Court.
5. The matter is referred to the appropriate authorities for criminal prosecution for the felonies committed by the defendant and their counsel, including fraud, obstruction of justice, and conspiracy to defraud the United States.
6. Proceedings to disbar the attorneys responsible for the fraudulent filings are initiated to prevent further abuse of the legal system.
7. The defendant and their counsel are ordered to pay all costs and attorney's fees incurred by the Plaintiff as a result of their fraudulent actions.
8. All awarded damages must be paid within 24 hours of the filing of this judgment.
9. This summary judgment is final and not subject to appeal by the defendants.

IT IS SO ORDERED.

Signed this ____ day of _____, 2024.

Hon. Amos L. Mazzant, III
United States District Judge